

**United States Bankruptcy Court
Middle District of Pennsylvania**

In re:

Kimberly Ann Conahan,

Debtor.

Case No. 23-00117-MJC

Chapter 13

Objection to ECF No. 50

Debtor's Objection to Motion for Relief from the Automatic Stay

Debtor Kimberly Ann Conahan, by her attorney, hereby objects to the Motion for Relief from the Automatic Stay filed by Movant U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2019- GS7 by its servicer, Rushmore Servicing. The Court must deny the Motion for the following reasons:

1. The amount of the purported arrearage is inconsequential.
2. The Debtor can satisfy the purported arrearage by making curative payments to the Movant through the plan.

As a result, no grounds for relief exist and the Court must deny the Motion in the form of order attached. The Court must also grant further relief in the Debtor's favor, if necessary and proper under the law.

Date: April 11, 2024

CIBIK LAW, P.C.

Attorney for Debtor

By: 

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Certificate of Service

I certify under penalty of perjury that on this date I caused this document to be served on all parties on the Clerk's Service List by electronic means through the CM/ECF system.

Date: April 11, 2024



Michael I. Assad

**United States Bankruptcy Court
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Objection to ECF No. 50

Order Denying U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2019-GS7 by its servicer, Rushmore Servicing's Motion for Relief from the Automatic Stay

The Court having considered the Motion for Relief from the Automatic Stay (ECF No. 50) filed by U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2019- GS7 by its servicer, Rushmore Servicing, and after notice and opportunity for hearing, it is hereby **ORDERED** that:

1. The motion is **DENIED**.